

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

AMBER EMILIA RUIZ and
DONEL A. GREEN

INDICTMENT

Case No. _____

Violations: 21 U.S.C. §§ 841(a)(1),
841(b)(1)(C), and 846; and 18 U.S.C. § 2

COUNT ONE

Conspiracy to Distribute and Possess with Intent to Distribute Oxycodone

The Grand Jury Charges:

From in or about March 2019 and continuing until in or about July 2019, in the
District of North Dakota, and elsewhere,

AMBER EMILIA RUIZ and
DONEL A. GREEN

knowingly and intentionally combined, conspired, confederated, and agreed together and
with others, both known and unknown to the grand jury, to distribute and possess with
intent to distribute a mixture and substance containing a detectable amount of oxycodone,
a Schedule II controlled substance, in violation of Title 21, United States Code, Sections
841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that the defendants and others would and did distribute, and possess with intent to distribute, pills containing a detectable amount of oxycodone, a Schedule II controlled substance;
2. It was further a part of said conspiracy that the defendants and others would and did attempt to conceal their activities;
3. It was further a part of said conspiracy that the defendants and others would and did use United States currency in their drug transactions;
4. It was further a part of said conspiracy that the defendants and others would and did use telecommunication facilities, including cellular telephones, to facilitate the distribution of controlled substances;
5. It was further a part of said conspiracy that the defendants and others utilized a residence in New Town, North Dakota, to store, conceal and distribute pills containing a detectable amount of oxycodone, a Schedule II controlled substance, and to store and conceal proceeds of distribution activity;

6. It was further a part of said conspiracy that one or more of the conspirators traveled between and within Michigan and North Dakota, and elsewhere, to obtain and distribute pills containing oxycodone, and to transport the proceeds of distribution activity;

In violation of Title 21, United States Code, Section 846; Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT TWO

Possession with Intent to Distribute Oxycodone

The Grand Jury Further Charges:

On or about July 22, 2019, in the District of North Dakota, and elsewhere,

AMBER EMILIA RUIZ and
DONEL A. GREEN,

individually, and by aiding and abetting, knowingly and intentionally possessed with intent to distribute approximately 126 pills that were a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THREE

Distribution of Oxycodone

The Grand Jury Further Charges:

From in or about March 2019 and continuing until in or about July 2019, in the District of North Dakota, and elsewhere,

AMBER EMILIA RUIZ,

individually, and by aiding and abetting, knowingly and intentionally distributed pills that were a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

A TRUE BILL:

/s/ Foreperson
Foreperson

/s/ Drew H. Wrigley
DREW H. WRIGLEY
United States Attorney

RLV/tmg